

August 24, 2005

Mr. Itzik Mizrahi Ariel Development 3100 Airport Way South Seattle, WA 98134

RE: Paint Chip Sampling of Suspect Paint Coatings at 3100 Airport Way South for Lead and Arsenic

Dear Mr. Mizrahi,

Prezant is pleased to present the laboratory sample results for paint chip samples collected at 3100 Rainier Avenue South in Seattle, Washington. Eric Hartman of Prezant Associates collected the samples on August 18, 2005.

At the direction of Mr. Conan Gale of SocialEyes Productions, four samples of exterior paint coatings were collected from various locations around the site. Please see the table below for sample analysis results.

Sample ID	Material Description	Location	Lead RL* (mg/kg)	Lead Results (mg/kg)	Arsenic RL* (mg/kg)	Arsenic Results (mg/kg)
Pb-01	Beige exterior paint of brick	Building 10, north face	49.0	7,200	0.97	6.9
Pb-02	Beige exterior paint of concrete	Building 7, west face	49.0	20,000	0.97	11
Pb-03	Beige exterior paint of concrete	Building 7, south face	50.0	3,300	0.99	13
Pb-04	Gold exterior paint on metal flashing	Building 8, parapet, south side	45.0	21,000	0.91	18

^{*}Reporting Limit

Examination of these samples was conducted for the presence of inorganic lead using flame atomic absorption spectrophotometry (FAA) in accordance with EPA SW-846 method 7000B as revised in 1998. This method reports results in milligrams per kilogram (mg/kg) or its equivalent, parts per million (ppm). For this batch of samples the lower level of detection for lead on this instrument using the EPA method was between 45 and 50 mg/kg (ppm).

Examination of these samples was conducted for the presence of inorganic arsenic using graphite furnace atomic absorption spectrophotometry (GFAA) in accordance with EPA SW-846 method 7010 as revised in 1998. This method reports results in milligrams per kilogram (mg/kg) or its equivalent, parts per million (ppm). For this batch of samples the

Ariel 3100 Airport Way Pb & As sampling report

lower level of detection for arsenic on this instrument using the EPA method was between 0.91and 0.99 mg/kg (ppm).

All of the samples were analyzed at NVL Laboratories in Seattle, Washington. Please see the attached laboratory data sheets for further information.

Based on the laboratory results, the exterior paint coatings on the buildings at the site contain detectable quantities of both lead and arsenic, and all exterior painted surfaces should be considered lead and arsenic containing.

The presence of lead in coatings raises concerns about worker and environmental protection. Special precautions will need to be taken to demolish the structures on this property.

WAC 296-155-176, Lead, applies to all construction work where an employee may be occupationally exposed to lead. Construction work includes activities such as demolition or salvage, removal or encapsulation, and renovation of materials that contain lead. When a worker may be exposed to lead, the employer must take the following actions according to WAC 296-155-176:

- Perform an exposure assessment for each operation where the employee may be exposed to lead at or above 30 micrograms per cubic meter (µg/m3). The exposure assessment consists of personal air monitoring to determine representative lead exposure levels for the work being performed;
- During the exposure assessment for demolition operations, the employer must provide and require to be worn half-mask air-purifying respirators equipped with high efficiency particulate air (HEPA) filters and disposable clothing;
- A designated change area which allows for separate storage areas for work and street clothing to prevent cross contamination should be provided;
- Hand washing facilities to allow employees to wash their hands and faces should be provided.
- Training to include hazard communication, safety, and the limitations, proper use, and maintenance of respirators.

In addition to the protective equipment and hygiene requirements, the employer must attempt to reduce the levels of airborne lead through the use of engineering controls such as ventilation and wet methods.

WAC 296-848, Arsenic, applies to all occupational expose to arsenic. When a worker may be exposed to arsenic, the employer must take the following actions according to WAC 296-848:

- 1. Perform an exposure assessment for each operation where the employee may be exposed to arsenic at or above 5 micrograms per cubic meter (µg/m3). The exposure assessment consists of personal air monitoring to determine representative arsenic exposure levels for the work being performed;
- During the exposure assessment, the employer must provide and require to be worn half-mask air-purifying respirators equipped with high efficiency particulate air (HEPA) filters and disposable clothing;
- A designated change area which allows for separate storage areas for work and street clothing to prevent cross contamination and shower facilities should be provided.

Ariel 3100 Airport Way Pb & As sampling report

- Hand washing facilities to allow employees to wash their hands and faces should be provided.
- Training to include hazard communication, safety, and the limitations, proper use, and maintenance of respirators.
- Establish exposure prevention practices including labeling of waste containers, ventilation, good housekeeping practices,

In addition to the protective equipment and hygiene requirements, the employer must attempt to reduce the levels of airborne arsenic through the development of an exposure control plan. For more information, obtain WAC 296-848 at http://www.lni.wa.gov/WISHA/Rules/arsenic/default.htm.

If you have questions regarding this letter or require further assistance, please feel free to contact me at (206) 281-8858.

Sincerely,

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Eric Hartman
Project Manager
Prezant Associates, Inc.

Attachments: (3)

Laboratory results

Field Notes

Certification